1	KAEMPFER CROWELL Robert McCoy, No. 9121 Sihomara L. Graves, No. 13239 1980 Festival Plaza Drive, Suite 650 Las Vegas, Nevada 89135 Telephone: (702) 792-7000 Facsimile: (702) 796-7181		
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5	Email: rmccoy@kcnvlaw.com Email: sgraves@kcnvlaw.com		
6	Attorneys for Defendant American Express		
7	Company		
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA		
10	PAUL INGRAHAM,	Case No. 2:21-cv-01277	
11	Plaintiff,		
12	vs.	STIPULATION AND ORDER TO	
13		EXTEND DEADLINE TO RESPOND	
	AMERICAN EXPRESS COMPANY,	(FIRST REQUEST)	
14	Defendants.		
15			
16	Plaintiff Paul Ingraham ("Ingraham") and defendant American		
17	Express Company ("Amex") stipulate that the deadline for Amex to respond to the		
18	complaint (ECF No. 1) be extended from August 13, 2021 until September 13,		
19	2021. This is the first extension sought in connection with this deadline.		
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1	This extension is requested to permit the recently hired counsel for		
2	Amex sufficient time to investigate the allegations in the complaint and to discuss		
3	the possibility of settlement with Ingraham.		
4	KIND LAW	KAEMPFER CROWELL	
5	/a/ Cananda Analas	Sile Gran	
6	/s/ Gerardo Avalos Michael Kind, No. 13903	Robert McCoy, No. 9121	
7	8860 South Maryland Parkway Suite 106 Las Vegas, Nevada 89123	Sihomara L. Graves, No. 13239 1980 Festival Plaza Drive, Suite 650 Las Vegas, Nevada 89135	
8	FREEDOM LAW FIRM	_	
9	George Haines, No. 9411	Attorneys for Defendant American Express Company	
10	Gerardo Avalos, No. 15171 8985 S. Eastern Ave., Suite 350		
11	Las Vegas, Nevada 89123 Attorney for Plaintiff Paul Ingraham		
12	Attorney for Flamith Faur highanam		
13	ORDER		
14	IT IS SO ORDERED		
15	<b>DATED:</b> 4:03 pm, August 17, 2021		
16	Benbucken		
17	BRENDA WEKSLER		
18	UNITEDSTATE	S MAGISTRATE JUDGE	
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